

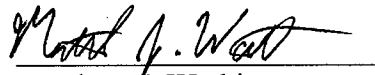
I, Matthew J. Watkins, Senior Counsel in the New York Regional Office of Plaintiff, the Securities and Exchange Commission (“Commission”), pursuant to 28 U.S.C. § 1746, declare the following:

1. I make this declaration in support of the Commission’s motion for leave to file a Second Amended Complaint. This declaration attaches documents that are relevant to the Commission’s motion.
2. Attached as Exhibit A is a true and complete copy of the Commission’s proposed Second Amended Complaint.
3. Attached as Exhibit B is an excerpt from investigative testimony of Raj Rajaratnam, taken June 7, 2007, in a Commission investigation entitled, *In re Sedna Capital Management* (NY-07665).
4. Attached as Exhibit C is a true and complete copy of a criminal Information to which defendant Anil Kumar pled guilty on January 7, 2010.
5. The Commission produced documents relating to Advanced Micro Devices Inc.’s July 2006 acquisition of ATI Technologies Inc. to defendants in this litigation on December 18, 2009. *See, e.g., SEC_0063137 et seq.*

6. For the reasons stated in the accompanying papers, the Commission respectfully requests that the Court grant it leave to file a Second Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2010.


Matthew J. Watkins